

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RENEE FASSBENDER AMOCHAEV,  
DEBORAH ORLANDO, KATHRYN N.  
VARNER and JUDY WEIL, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

CITIGROUP GLOBAL MARKETS, INC.,  
d/b/a SMITH BARNEY,

Defendant.

Case No. C- 05-1298 PJH

**STIPULATION AND ~~PROPOSED~~  
ORDER RE MODIFICATION OF CLASS  
CERTIFICATION SCHEDULE AND  
DEADLINE FOR COMPLETING ADR  
PROCESS**

WHEREAS, by Order dated September 14, 2005, the Court entered a case management Order setting a class certification briefing schedule, as well as requiring the parties to complete an ADR process by no later than March 31, 2006;

WHEREAS, the parties have retained the services of experienced mediator Hunter R. Hughes and have engaged in two mediation sessions, with an additional session set for May 23, 2006;

WHEREAS, the parties are engaged in mediation at the same time that they are preparing for class certification;

WHEREAS, a modification to the schedule to move back the class certification briefing and hearing dates, and the date for completion of ADR, will facilitate mediation discussions;

WHEREAS, due to defense counsel's summer trial calendar, the parties request that the schedule be modified by approximately 120 days; and

WHEREAS, the proposed modification of the class certification and ADR schedule will not unduly delay processing the action,

The parties, by and through their counsel of record, stipulate and agree as follows:

The parties propose the following schedule for ADR and class certification:

Parties to Complete ADR Process	July 31, 2006
Plaintiffs' Motion for Class Certification:	September 29, 2006
Defendants' Opposition:	November 8, 2006
Plaintiffs' Reply:	December 8, 2006
Class Certification Hearing:	<del>January 11, 2007</del> January 10, 2007

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Respectfully submitted,

James M. Finberg (State Bar No. 114850)  
 Kelly M. Dermody (State Bar No. 171716)  
 Bill Lann Lee (State Bar No. 108452)  
 LIEFF, CABRASER, HEIMANN &  
 BERNSTEIN, LLP  
 Embarcadero Center West  
 275 Battery Street, 30th Floor  
 San Francisco, CA 94111-3339  
 Telephone: (415) 956-1000  
 Facsimile: (415) 956-1008

Elizabeth A. Alexander  
 LIEFF, CABRASER, HEIMANN &  
 BERNSTEIN, LLP  
 3319 West End Avenue, Suite #600  
 Nashville, TN 37203-1074  
 Telephone: (615) 313-9000  
 Facsimile: (615) 313-9965

1 Cyrus Mehri  
2 Lisa M. Bornstein  
3 Sandi Farrell  
4 Anna M. Pohl  
5 MEHRI & SKALET, PLLC  
6 1300 19th Street, N.W., Suite 400  
7 Washington, D.C. 20036  
8 Telephone: (202) 822-5100  
9 Facsimile: (202) 822-4997

Adam T. Klein  
Piper Hoffman  
OUTTEN & GOLDEN LLP  
3 Park Avenue, 29th Floor  
New York, New York 10016  
Telephone: (212) 245-1000  
Facsimile: (212) 977-4005

Dated: March 17, 2006

By: /s/ Kelly M. Dermody  
Kelly M. Dermody

*Attorneys for Plaintiffs*

9 Jay Cohen  
10 Daniel Toal  
11 PAUL, WEISS, RIFKIND, WHARTON  
12 & GARRISON LLP  
13 1285 Avenue of the Americas  
14 New York, NY 10019- 6064  
15 Telephone: (212) 373-3000  
16 Facsimile: (212) 757- 3990

Malcolm A. Heinicke (State Bar No. 194174)  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street  
27th Floor  
San Francisco, California 94105  
Telephone: 415 512-4000  
Facsimile: 415 512-4077

Dated: March 17, 2006

By: /s/ Daniel Toal  
Daniel Toal

*Attorneys for Defendant*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/20/06

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